<div align="center">REMARKS</div>

Claims 7-28 are currently pending in this application. Claims 7, 15, 18, and 21 have been amended. Claims 27 and 28 have been added. No new matter has been introduced by way of these amendments.

As a preliminary matter, applicant's representative notes that Applicant previously requested an interview and submitted an Applicant Initiated Interview Request form concurrent with filing a response Amendment on May 10, 2005. The Examiner has responded by issuing a final Office Action without scheduling or conducting an interview with the Applicant, to which Applicant is entitled. In the event the Examiner finds the present application is still not in a condition for allowance after considering these remarks, Applicant respectfully requests that the Examiner withdraw the finality of the Office Action and schedule an interview with the Applicant to discuss the allowability of the claims over the cited references. Applicant's representative may be contacted at (206) 622-4900.

Applicant also notes that the Examiner has not cited Hayes, U.S. Patent Application Publication 2002/0046204, ("Hayes") in the Notice of References Cited (form PTO-892) despite rejecting claims 13 and 14 in view of the Hayes reference. Applicant respectfully requests the Examiner to amend the Notice of References Cited to include Hayes.

In addition, please note that several of Applicant's claims, including claims 12 and 26, recite language that under recent case law is intended to state two or more choices in the alternative. Applicant wishes to clarify that this language is to be interpreted in the disjunctive. Namely, the phrase "at least one of A or B" is to be interpreted as including: "A," or "B," or "A and B." Also, the phrases "at least one of A, B, or C," "A, B, or C," and "A or B" are to be interpreted in the same manner.

Overview of Cited References

The Examiner has cited to three references in rejecting Applicant's pending claims: Williams, U.S. Patent No. 6,591,272 ("Williams"), Hayes, U.S. Patent Application Publication 2002/0046204, ("Hayes"); and Rosebrugh et al., U.S. Patent No. 5,630,168, ("Rosebrugh").

<div align="center">8</div>

The Williams reference describes a system in which "contents of databases are translated into objects by reading the database schema metadata to determine data interrelationships and create objects with nominal human to computer interaction. Metadata for any number of databases is normalized in a standardized view. Skeleton code templates representative of final classes to be produced are accessed and merged with the standardized view. Source code for the class of the objects is then generated." (Williams, Abstract)

The Hayes reference describes "automating database bufferpool tuning for optimized performance that employs certain heuristic algorithms to achieve its goals." (Hayes, Abstract)

The Rosebrugh reference describes a pen-based data acquisition system. The pen-based data acquisition system has a "microcontroller for controlling the power flow to the various subsystems." [Rosebrugh, at column 2, lines 66-67 (hereinafter cited in col#:line# format).]

Rejections Under 35 U.S.C. § 102 & § 103

The Examiner has rejected claims 7-12 and 15-25 under 35 U.S.C. § 102(e) as being anticipated by Williams. The Examiner has also rejected claims 13 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Williams as applied in claim 7 in view of Hayes. In addition, the Examiner has rejected claim 26 under 35 U.S.C. § 103(a) as being unpatentable over Williams as applied in claim 21 in view of Rosebrugh. The Examiner appears to be equating the standardized view used in Williams with various aspects of the logical view recited in claims 7-20 and draws the conclusion that, therefore, Williams somehow teaches, suggests, or motivates Applicant's claimed invention. Applicant respectfully traverses these rejections.

Each of the pending independent claims 7, 15, 18, and 21, as amended, recite aspects not taught, motivated, or suggested by Williams, Hayes or Rosebrugh, alone or in any motivated combination.

Specifically, independent claim 7 as amended, and, by virtue of incorporation, dependent claims 8-14 and new claim 27 recite: "the at least one logical view including at least one combination of tables from a plurality of normalized relational database tables, the

combination previously constructed *without reference to foreign keys* in the plurality of tables."
(Emphasis added.) Williams does not teach, suggest or motivate creating a combination of tables
without reference to foreign keys. Rather, Williams teaches that foreign keys are explicitly used
to create the standardized view and logical objects that the Examiner compares to the Applicant's
claimed logical view. For example, Williams states: "A persistence class is built for each foreign
key chain that is found in all of the relational database schemas scanned by
ObjectServerFactory." (Williams 39:37-39)

      Also, independent claim 15 as amended, and, by virtue of incorporation, claims
16 and 17 recite: "the at least one logical view including at least one combination of tables from
a plurality of normalized relational database tables, the combination previously constructed
without reference to foreign keys in the plurality of tables." For the same reasons stated above
with reference to claims 7-14 and 27, claims 15-17 are allowable over Williams.

      In addition, independent claim 18 as amended, and, by virtue of incorporation,
claims 19 and 20 recite: "a definitions file having a plurality of sections that define a
correspondence between stored data in a plurality of stored normalized relational database tables
and one or more logical view tables, such that at least one of the logical view tables is
constructed without using a foreign key reference from any of the plurality of tables." Again,
because Williams teaches away from creating a standardized view and logical objects *without*
using foreign keys, claims 18-20 also are allowable over Williams.

      Independent claim 21 as amended, and, by virtue of incorporation, claims 22-26
and new claim 28 recite: "the abstraction conversion tool driven by a definitions file having a
plurality of sections that define a correspondence between stored data and one or more objects
representing at least some of the stored data such that the definitions file may be changed without
recompiling code for the one or more objects." Williams does not teach, suggest or motivate that
a definition file can be changed without recompiling code for the one or more objects. On the
contrary, Williams states: "[i]t is very important to get [attribute and object] names correct, as
they will be used in literally dozens of places: in the IDL, build scripts, XML files, server and
client software." (Williams 46:8-14). Williams also states: "[s]ource code for the classes is then
generated from the standardized view when merged with the prepared template definitions. The

source code is then *compiled into binary executable form* into the classes desired." (Williams 4:66-5:2, emphasis added). The techniques described by Williams therefore necessitate recompiling when data stored in the underlying database tables is changed. Thus, claims 22-26 and 28 are allowable over Williams.

Furthermore, new dependent claim 27 recites a number of other aspects that are not taught, suggested, or motivated by Williams, alone or in any motivated combination with Hayes or Rosebrugh. Dependent claim 27 recites: "wherein the at least on logical view includes at least one of a virtual attribute that is not stored in the plurality of database tables, an enumeration of attribute values that convey a logical meaning outside the database tables, or one or more restrictions to limit which records in a table from the plurality of database tables are included in the logical view." Williams does not describe that a standardized view can include anything that resembles the recited "virtual attribute that is not stored in the plurality of database tables," "enumeration of attribute values that convey a logical meaning outside the database tables," or "one or more restrictions to limit which records in a table from the plurality of database tables are included." For example, Williams teaches away from having an "enumeration of attribute values that convey a logical meaning outside the database tables" when it states: "[t]he Job ID picklist is possibly useful, but only after a bit of enhancement. Specifically the default descriptions 'D: JJJ' should be *replaced with* real world descriptions of what the otherwise unintelligible values mean." (Williams 57:18-21, emphasis added). Williams goes on to state: "the generated picklist descriptors >D: xxxx< are unique so a sed script can run over all HTML files to update all picklists which share a common description." (Williams 58:6-9). Since the sed script is neither part of the standardized view nor the object implementing the standardized view in Williams, Williams cannot teach, motivate or suggest "an enumeration of attribute values that convey a logical meaning outside the database tables" as part of the logical view, as recited by claim 27.

Various dependent claims are allowable for at least the same reasons as the independent claims analyzed above. For the sake of brevity, each dependent claim is not analyzed separately. However, Applicant also notes that the Examiner has rejected several of the dependent claims, namely claims 15, 16, and 26 as obvious over Williams in combination with

Hayes (claims 15 and 16) or with Rosebrugh (claim 26). Applicant notes that in addition to the above reasons, Hayes does not render the join cache obvious in view of Williams. The section in Rosebrugh relied upon by the Examiner states: "[c]aches typically store information about *data definitions* in memory to help *the database engine* improve performance." (Hayes, ¶0005, emphasis added). However, the join cache of claims 13 and 14 are neither contained in a database engine nor limited to data definitions. In fact, Williams teach away from using a cache, stating: "OSF performs the absolute minimal database I/O to build the object(s)- one read per query request; no more, no less. This is true whether the client end or server middleware requests a single object or a block of objects." (Williams, 12:46-49). In order to maintain a cache, additional database I/O would need to be performed initially and periodically to keep the database tables and the cache synchronized in direct contradiction of the teachings in Williams.

Applicant also notes that in addition to the above reasons Rosebrugh does not show: "creating a powerflow application." (Claim 26). The phrase "powerflow application," as recited in claim 26, is not the same as "controlling the power flow." The former refers to a type of *application*, and the latter refers to the flow of power to a component of a device. Specifically, Rosebrugh only mentions power flow with respect to: "a microcontroller for controlling the power flow to the various subsystems." (Rosebrugh 2:66-67). The power flow to the various subsystems in Rosebrugh does not include examining the total generation of electrical power on a bus. *See, e.g.,* Applicant's Specification, page 30, Powerflow Requirements. Furthermore, the specification describes an example application that uses the Electric Power Research Institute API. The EPRI API is designed for use within the electrical power industry, as oppose to the electrical power needs of individual electronic devices.

Applicant further reserves the right to further present arguments regarding the Examiner's statements regarding the cited references at a later time, should such become necessary. Specifically, no waiver (legal, factual, or otherwise), implicit or explicit, is hereby intended.

For these reasons and others, all of Applicant's claims 7-26, as amended, and new claims 27-28 are not taught, motivated, or suggested by Williams, alone or in combination with

Hayes and/or Rosebrugh. Therefore, claims 7-28 are not anticipated or rendered obvious by the cited references.

Conclusion

             In view of the foregoing, Applicant submits that all of the claims in this application are allowable over the cited references. In the event the Examiner disagrees or finds minor informalities, Applicant respectfully requests a telephone interview to discuss the Examiner's issues and to expeditiously resolve prosecution of this application. Accompanying this Amendment After Final is a second Request for Telephone Interview in the event the Examiner does not agree that the claims are allowable over the cited references. Applicant's representative can be contacted at (206) 622-4900.

             In closing, Applicant respectfully requests the Examiner to enter these amendments and to reconsider this application and its early allowance. The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090. Again, Applicant's representative thanks the Examiner for his prompt and courteous attention.

Respectfully submitted,

SEED Intellectual Property Law Group PLLC

Ellen M. Bierman

Ellen M. Bierman
Registration No. 38,079

EMB:asl

Enclosure:
      Applicant Initiated Second Interview Request Form

701 Fifth Avenue, Suite 6300
Seattle, Washington 98104-7092
Phone: (206) 622-4900
Fax: (206) 682-6031
C:\NrPortbl\iManage\ANGIEL\761602_1.DOC

Applicant Initiated Interview Request Form

Application No.: <u>10/047,457</u>   First Named Applicant: Marck R. Robinson

Examiner: <u>Chuck O. Kendall</u>   Art Unit: <u>2122</u>   Status of Application: <u>Pending</u>

Tentative Participants:

(1) <u>Ellen M. Bierman</u>   (2) <u>Examiner Chuck O. Kendall</u>

(3) _____   (4) _____

Proposed Date of Interview: <u>To be determined</u>   Proposed Time: <u>10 a.m. applicant's time</u> (AM/PM)

Type of Interview Requested:

(1) [X] Telephonic   (2) [ ] Personal   (3) [ ] Video Conference

Exhibit To Be Shown or Demonstrated: [ ] YES   [X] NO

If yes, provide brief description: _____

Issues To Be Discussed

	Issues (Rej., Obj., etc)	Claims/ Fig. #s	Prior Art	Discussed	Agreed	Not Agreed
(1)	102(e) Rejections	Claims 7-12, 15-25	Williams	[ ]	[ ]	[ ]
(2)	103(a) Rejections	Claims 13-14	Williams and Hayes	[ ]	[ ]	[ ]
		Claim 26	Williams and Rosebrugh			
(3)	_____	_____	_____	[ ]	[ ]	[ ]

[ ] Continuation Sheet Attached

Brief Description of Arguments to be Presented:

Rejections of claims 7-26 and Applicant's arguments in support of allowance of all pending claims over Williams, Hayes and Rosebrugh
_____
_____

An interview was conducted on the above-identified application on _____.

NOTE:

This form should be completed by applicant and submitted to the examiner in advance of the interview (see MPEP § 713.01).

This application will not be delayed from issue because of applicant's failure to submit a written record of this interview. Therefore, applicant is advised to file a statement of the substance of this interview (37 CFR 1.33(b)) as soon as possible:

Ellen M. Bierman
_____   _____
(Applicant/Applicant's Representative Signature)   (Examiner/SPE Signature)

Ellen M. Bierman
Typed/Printed Name of Applicant or Representative

38,079
Registration Number, if applicable